

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOARD OF TRUSTEES OF THE LOCAL)	
UNION NO. 422 U.A. OF JOLIET,)	
ILLINOIS PENSION FUND AND)	
BOARD OF TRUSTEES OF THE LOCAL)	
UNION NO. 422 U.A. OF JOLIET,)	No. 08 C 211
ILLINOIS WELFARE FUND,)	
)	Judge Coar
Plaintiffs,)	
)	Magistrate Judge Denlow
v.)	
)	
HILDEMAN PLUMBING, INC.,)	
an Illinois corporation, and RANDY)	
HILDEMAN, Individually,)	
)	
Defendant.)	

MOTION FOR ORDER OF DEFAULT AND JUDGMENT IN SUM CERTAIN

Plaintiffs, by one of their attorneys, DONALD D. SCHWARTZ and ARNOLD AND KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter an Order of Default as to liability and Judgment in favor of Plaintiffs and against Defendant, RANDY HILDEMAN, Individually.

In support thereof, Plaintiffs state:

1. This case was filed on January 9, 2008.
2. Defendant was served with Summons and Complaint on January 23, 2008.
3. In excess of 20 days have expired since Service of Process, however, Defendant has failed to file an answer or otherwise plead.
4. Per the affidavit of Olga Kane, Defendant signed a note that is now in default for \$26,666.68 for resolution of reports for September 2006 through January 2007. (Exhibit A)
5. Per the affidavit of Donald Schwartz, attorney for Plaintiffs in legal fees and

expenses \$1,300.00 has been incurred in this suit. (Exhibit B)

WHEREFORE, Plaintiffs pray for:

1. An Order of Default against the Defendant.

Judgment be rendered in the amount of \$27,966.68 for the BOARD OF TRUSTEES OF THE LOCAL UNION NO. 422, U.A. OF JOLIET, ILLINOIS PENSION FUND, et. al., and against RANDY HILDEMAN, Individually.

Respectfully submitted,

BOARD OF TRUSTEES OF THE LOCAL
UNION NO. 422, U.A. OF JOLIET, ILLINOIS
PENSION FUND, et. al.

s/ Donald D. Schwartz
Counsel for Plaintiffs

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